

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

SECURITIES AND EXCHANGE COMMISSION,))
))
Plaintiff,))
))
v.)	Civil Action No. 1:20-cv-05227
JOHN M. FIFE, CHICAGO VENTURE PARTNERS, L.P., ILIAD RESEARCH AND TRADING, L.P., ST. GEORGE INVESTMENTS LLC, TONAQUINT, INC., AND TYPENEX CO-INVESTMENT, LLC,)	Honorable Martha M. Pacold Honorable Daniel P. McLaughlin
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Defendants.))
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JOINT STATUS REPORT

Pursuant to the Court’s Order dated January 16, 2025 (*see* Dkt No. 184), Plaintiff United States Securities and Exchange Commission (“SEC”) and Defendants John M. Fife, Chicago Venture Partners, L.P., Iliad Research and Trading, L.P., St. George Investments LLC, Tonaquint, Inc., and Typenex Co-Investment, LLC (collectively, “Defendants,” and, together with the SEC, “the Parties”), respectfully submit this Joint Status Report and propose a briefing schedule for dispositive motions.

The Parties propose the following: (i) by March 21, 2025, Defendants shall file any summary judgment motion (excluding any motion relating to remedies, which, to the extent necessary, will be reserved until after the Court rules on summary judgment). Defendants respectfully request leave to exceed the 15-page limit set forth in Local Rule 7.1 for their memorandum of law in support of a summary judgment motion and instead request a 25-page limit; (ii) by April 29, 2025, the SEC shall file any summary judgment motion (excluding any motion

relating to remedies, which, to the extent necessary, will be reserved until after the Court rules on summary judgment), and, by that same date, respond to any summary judgment motion filed by Defendants. The SEC proposes combining its memorandum of law in support of a SEC summary judgment motion with a memorandum of law in opposition to any summary judgment motion filed by Defendants. The SEC respectfully requests leave to exceed the 15-page limit set forth in Local Rule 7.1 for this combined memorandum of law and instead requests a 30-page limit; (iii) by June 6, 2025, Defendants shall reply to the SEC's response to any summary judgment motion filed by Defendants, and, by that same date, respond to any summary judgment motion filed by the SEC. Defendants propose combining their reply memorandum of law in support of their summary judgment motion with their memorandum of law in opposition to any summary judgment motion filed by the SEC. Defendants respectfully request leave to exceed the 15-page limit set forth in Local Rule 7.1 for this combined memorandum of law and instead request a 25-page limit; (iv) by July 10, 2025, the SEC shall reply to Defendants' response to any SEC summary judgment motion. The SEC respectfully requests leave to exceed the 15-page limit set forth in Local Rule 7.1 for this memorandum of law and instead requests a 20-page limit; and (v) the Parties may also file any non-dispositive motions that the Parties believe are necessary to resolve the issues raised in any dispositive motions. If a Party determines that any such non-dispositive motion is necessary, the Parties will jointly propose a briefing schedule for such motion to the Court. The Parties' memoranda of law for any such non-dispositive motions shall comply with the 15-page limit set forth in Local Rule 7.1 unless otherwise ordered by the Court.

Respectfully submitted,

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DATED: January 23, 2025

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